

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Robert Nunez	Chapter 13 Proceeding
Debtor	15-15811 MDC
	Claim No. 15

NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC

Now comes Wells Fargo Bank, NA ("Creditor"), by and through undersigned counsel, and hereby submits this Notice of Forbearance Agreement to the Court regarding the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently requested a forbearance period of three (3) months in which the Debtor will not tender mortgage payments to Creditor that would come due on the mortgage starting of April 1, 2020 through June 1, 2020. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage. During the forbearance period Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Because of the uncertainties surrounding how long this pandemic will last, Creditor will work with Debtor or Debtor's counsel to determine when Debtor will be able to resume making mortgage payments and when/how the Debtor will cure the delinquency created by the forbearance period ("forbearance arrears"). Once the forbearance plan ends and the Creditor and Debtor or Debtor's counsel agree on an appropriate repayment or loss mitigation program, Creditor will file a notice or an amended/supplemental claim consistent with local practice.

Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

/s/ Jill Manuel-Coughlin, Esquire

POWERS KIRN, LLC

Jill Manuel-Coughlin, Esquire; ID #63252

Harry B. Reese, Esquire; ID #310501

Sarah K. McCaffery, Esquire; ID #311728

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090; Facsimile: 215-942-8661

Email: bankruptcy@powerskirn.com

Attorney for Movant

Dated: May 12, 2020

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Robert Nunez	Chapter 13 Proceeding
Debtor	15-15811 MDC
	Claim No. 15

CERTIFICATE OF SERVICE

I, as counsel for Wells Fargo Bank, NA, hereby certify that a copy of the Notice of Forbearance Agreement was served upon the following persons by electronic notification and/or first class U.S. mail, on May 12, 2020:

Parties Served via Electronic Notification:

David M. Offen, Esquire
601 Walnut Street
Suite 160 West
Philadelphia, PA 19106
Email: info@offenlaw.com
Attorney for Debtor

William C. Miller, Esquire
1234 Market Street, Suite 1813
Philadelphia PA 19107
Email: ecfemails@ph13trustee.com
Trustee

Parties Serviced via First Class Mail:

Robert Nunez
3722 N 16th St
Philadelphia PA 19140
Debtor

/s/ Jill Manuel-Coughlin, Esquire
POWERS KIRN, LLC
Jill Manuel-Coughlin, Esquire; ID #63252
Harry B. Reese, Esquire; ID #310501
Sarah K. McCaffery, Esquire; ID #311728
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053
Telephone: 215-942-2090; Facsimile: 215-942-8661
Email: bankruptcy@powerskirm.com
Attorney for Movant

Dated: May 12, 2020